

OFI's Records Retention Schedule¹ for Depository Institutions and Holding Companies

A. Depository Institution's and their Subsidiaries' General Records

1. To be retained at least 4 years

- a. Internal and external audit reports (including directors exams, supervisory committee audit reports, audited financial statements, external audit management letters, internal and external information technology audit reports, and audit report responses), and any other reports (i.e., loan reviews) performed by outside consultants
- b. Reports of Condition and Income (Call Reports) and records supporting all call report schedules²
- c. Daily overdraft reports
- d. General ledger and general ledger transaction reports w/ supporting vouchers and tickets (should show the daily amounts of federal funds sold to each institution)
- e. Monthly deposit statements for directors and executive officers
- f. Reconciliation of "due to" and "due from" bank accounts
- g. State and federal tax records/returns
- h. Asset chargeoff and recovery records
- i. Internal asset classification report or watch list
- j. Quarterly analysis of the adequacy of allowances for loan and lease losses (ALLL)
- k. Annual budget
- l. Interest rate risk (IRR) reports
- m. Overall internal risk-assessment reports
- n. Contracts w/ service providers (i.e. EDP, NDIP, etc.)

¹ Records to be retained by Louisiana state-chartered depository institutions and their subsidiaries, related holding companies, and non-bank affiliates for the regulatory and supervisory purposes of this Office.

² Call Reports and related records include, but are not limited to, the following: deposit/checking account trial balance; loan trial balance; income statements and dividends; and consolidated financial statements.

- o. Agreements for fed funds lines or other borrowings
 - p. Letters of credit
 - q. Investment securities records of sales
 - r. Customer complaints
 - s. Documentation of responses to Section 314(a) customer matching requests from FinCEN
2. To be retained **at least 5 years**
- a. Suspicious Activity Reports (SARs) filed with the Financial Institutions Crime Enforcement Network (FinCEN) and any SAR-related supporting documentation
 - b. Kiting Suspect Reports
 - c. Currency Transaction Reports (CTRs) and supporting documentation, including exempt persons list
3. To be retained **at least "Life +"**³
- a. Insurance records and policies
 - b. Investment securities records of purchases
 - c. Investment safekeeping receipts
 - d. Loan files (including supporting documentation and payment histories)
 - e. Other real estate owned files (including supporting documentation and records)
 - f. Leases
 - g. Fixed asset records
 - h. Salaries and related benefit plans
 - i. Records of any debt instruments
 - j. Records of savings accounts, demand accounts, certificate of deposits, etc.
 - k. Liquidation account records (applicable to stock thrifts that were formerly mutual)

³ "Life +" means the life of the transaction plus a reasonable time period thereafter, with such time period being at least three years. With respect to trust and holding company records, "Life +" means the life of the trust account plus a reasonable time period thereafter, with such time period being at least five years.

4. To be retained at least **Life + 5 years**
 - a. Customer identification information, including descriptions of documents relied upon for verification, descriptions of methods and result of non-documentary means of verification, and descriptions of resolution of any discrepancies discovered when verifying information provided by the customer
5. To be retained **permanently**
 - a. Articles of Incorporation, Bylaws, and Amendments
 - b. Minutes of meetings of stockholders/shareholders, board of directors, and committees
 - c. Stock ledger

B. Depository Institution's Consumer Credit Records

1. To be retained **at least 4 years**
 - a. Death Claims
 - i. Copy of death certificate
 - ii. Copy of checks or other confirmation of claim payment received from insurance company
 - iii. Copy of check indicating payment to secondary beneficiary, if applicable
 - b. All other insurance claims
 - c. Attorney accounts
 - i. Amount paid to attorney, with attorney fees and court costs shown separately
 - ii. Receipt from clerks of court indicating court costs
 - d. Judgments
 - i. Similar documents as for attorney accounts [See B(1)(c)]
 - ii. Copy of signed judgment

2. To be retained **at least "Life +"**³

- a. Consumer loan agreements and files (including notes, disclosure statements, supporting documentation and payment histories)
- b. Agreements w/ outside credit card providers
- c. Insurance premium finance agreements

C. Depository Institution's Trust Department Records

1. To be retained **at least 4 years**

- a. Annual report of trust assets and supporting documents
- b. Journal sheets for accounting division and stock transfers
- c. Tax records/returns

2. To be retained **at least "Life +"**³

- a. Document files
- b. Fee cards
- c. Ledger records

3. To be Retained **Permanently**

- a. Trust committee and trust investment committee minute books

D. Holding Company's and their Non-Banking Subsidiaries' Records

1. To be retained **at least 4 years**

- a. Internal and external audit reports (including audited financial statements and external audit management letters and responses), and any other reports performed by outside consultants
- b. Annual, semiannual, or quarterly reports submitted to the Federal Reserve (e.g. FR Y-6, FR Y-9, etc.) and records supporting the schedules contained therein
- c. Overall risk assessment reports
- d. General ledger and general ledger transaction reports with supporting vouchers and tickets
- e. Reconciliation of "due to" and "due from" bank accounts

- f. State and federal tax records/returns
 - g. Asset chargeoff and recovery records
 - h. Internal asset classification report or watch list
 - i. Quarterly analysis of the allowance for loan and lease losses
 - j. Records associated with permissible activities at parent company
 - k. Annual budget
 - l. Contracts w/ service providers (i.e. EDP, NDIP, etc.)
 - m. Agreements for fed funds lines or other borrowings
 - n. Letters of credit
 - o. Investment securities records of sales
 - p. Customer complaints
2. To be retained **at least 5 years**
- a. Suspicious Activity Reports (SARs) filed with the Financial Institutions Crime Enforcement Network (FinCEN) and any SAR-related supporting documentation
 - b. Kiting Suspect Reports
3. To be retained **at least "Life +"**³
- a. Insurance records and policies
 - b. Investment securities records of purchases
 - c. Investment safekeeping receipts
 - d. Loan files (including supporting documentation and payment histories)
 - e. Other real estate owned files (including supporting documentation and records)
 - f. Leases
 - g. Fixed asset records
 - h. Salaries and related benefit plans
 - i. Records of any debt instruments

4. To be retained **permanently**
 - a. Articles of Incorporation
 - b. Minutes of meetings of stockholders/shareholders, board of directors, and committees
 - c. Stock ledger

[REVISED effective 1/1/04]